



May 25, 2021

Via ECF

Hon. Denise L. Cote
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

United States v. Juan Rosario, 19-Cr-367 (DLC)
AMENDED Consent Request for Modification of Bond Conditions

Honorable Judge Cote:

We write with the consent of the Government and Pretrial Services (PTS) to respectfully request an amendment to our previously endorsed request for a modification of Mr. Rosario's bond conditions.

On May 21, 2021, this Honorable Court endorsed and ordered our request that (1) Mr. Rosario be allowed access to his passport for the limited purpose of obtaining a driver's license/identification card; and (2) the removal of Mr. Rosario's location monitoring device and the imposition of a curfew in lieu of home incarceration. With respect to location monitoring, we request that in addition to its removal that there be no curfew imposed on Mr. Rosario. There is no objection by either the Government nor PTS to this amended request.

We thank the Court in advance for its consideration of this matter.

Respectfully,

s/ Judith Vargas

Judith Vargas

Attorney for Mr. Juan Rosario

cc: AUSA Kyle Wirshba
AUSA Juliana Moore
U.S. PTSO Marlon O'Valles

Denied.
Denise Cote
5/25/21